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April 20, 2023

**VIA ECF**

Honorable Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *United States v. Nathaniel Chastain*, No. 22-cr-305 (JMF)

Dear Judge Furman:

We write pursuant to the Court's April 19, 2023 ruling and instruction therein that any request or proposal for additional *voir dire* related to "insider trading" be filed in the form of a letter. *See* ECF No. 92. Accordingly, we respectfully request that the Court add the following explanation and questions regarding "insider trading" to its *voir dire*:

1. I have already provided you with a summary description of the case. But you may hear the Government refer throughout the trial to Mr. Chastain's conduct in the case as "insider trading." While the Government believes that insider trading describes Mr. Chastain's alleged conduct, insider trading is not one of the two charged offenses in this case. The defense disputes that Mr. Chastain's conduct can be described as "insider trading."
2. Are you familiar with the term "insider trading"? If so, what is your understanding of that term?
3. Have you ever worked on Wall Street or in the financial industry?
4. Other than retirement accounts, have you ever invested in stocks, bonds, or other financial instruments?
5. Have you ever made or lost a significant amount of money on an investment? If so, please describe.

Thank you for the Court's consideration.

Honorable Jesse M. Furman

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Respectfully submitted,

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